

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Improving 911 Reliability	)	PS Docket No. 13-75
	)	
	)	

**COMMENTS OF VERIZON**

The Commission should maintain its annual 911 network reliability certification and PSAP notification rules, and continue to apply them only to companies that provide 911 services directly to PSAPs. These rules hold “covered service providers” accountable for the reliability of their legacy, transitional, and next generation 911 networks, while affording flexibility to meet unique PSAP needs. The Commission should also support new industry practices that will help simplify the PSAP outage notification process for PSAPs and covered 911 service providers alike.

**I. THE 911 RELIABILITY STANDARDS AND CERTIFICATION RULES SERVE AN IMPORTANT PURPOSE.**

The Commission’s existing reliability requirements for covered 911 service providers have been effective in mitigating the frequency, scope, and impact of preventable 911 network outages.<sup>1</sup> Verizon has successfully incorporated the Commission’s criteria for backup power, 911 circuit diversity, and diverse network monitoring links into the legacy 911 network configurations it supports for PSAPs. The annual certification process also remains an important ongoing reminder of the need to operationalize 911 reliability into network planning, change, and maintenance decisions and practices.

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<sup>1</sup> See *Public Safety and Homeland Security Bureau Seeks Comment on 911 Network Reliability Rules*, Public Notice, PS Docket No. 13-75, DA 18-612, at 2 (PSHSB 2018) (“*Public Notice*”).

Being able to certify to “alternative measures” to those specified in the rules affords important flexibility to meet the Commission’s reliability criteria, and appears to serve largely the same purpose as the “general reasonableness requirement” suggested in the *Public Notice*.<sup>2</sup> PSAPs using legacy systems present their 911 service providers with a wide variety of configurations based on their resources and governance structures. In some cases the legacy provider may be the sole provider of 911 network services (providing all selective routing, CAMA circuits, and ANI/ALI functions); in other cases third party service providers may provide one or more of these components; and in other cases PSAPs will generate their own configurations. The availability to certify to alternative measures enables Verizon to work cooperatively with PSAPs to address unconventional 911 and monitoring link circuit configurations, and to standardize our practices for backup power equipment across all manufacturer brands. This flexibility will be increasingly important as PSAPs consolidate their operations and pool their resources in different ways.

With respect to transitional and NG911 networks, Verizon has worked cooperatively with 911 governance authorities and new NG911 providers to ensure that network reliability is maintained as PSAPs migrate away from legacy 911 networks and services. The Commission’s rules already—and appropriately—cover NG911 service providers,<sup>3</sup> as well as the circumstances in which 911 networks transition from legacy to NG911 status. The rules ensure accountability in all of these situations by applying certification requirements to all entities that provide 911 services *directly* to PSAPs. And maintaining the current scope of the covered 911 service

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<sup>2</sup> See 47 C.F.R. § 12.4(b); *Public Notice* at 2.

<sup>3</sup> See 47 C.F.R. § 12.4(a)(4).

provider definition will both accommodate the transition to NG911 while promoting accountability for providers directly responsible to PSAPs for providing reliable 911 services.

## **II. 911 SERVICES PROVIDED DIRECTLY TO PSAPS SHOULD REMAIN THE SOLE FOCUS OF THE CERTIFICATION AND PSAP NOTIFICATION RULES.**

Applying the annual certification rules to those entities providing 911 services “directly to a public safety answering point” already accommodates “the growing diversity of industry participants” by drawing clear lines of accountability for the entity or entities directly responsible to the PSAP for the performance of its 911 network.<sup>4</sup> The certification responsibilities should apply to the prime contractor(s) directly serving a PSAP (whether an incumbent provider, integrator, or other entity responsible for the PSAP’s routing and re-routing capabilities), irrespective of how the PSAP’s governing authority structures its contractual arrangements. Applying new certification rules to entities that do not directly provide services to PSAPs would confuse both service providers and government stakeholders and undermine accountability.

That is also true for the Commission’s PSAP notification rules, which impose more prescriptive standards for covered 911 service providers than for other service providers.<sup>5</sup> Verizon has generally been able to meet these requirements by integrating monitoring and notification systems so that alerts are timely, predictable, and informative, and through related employee training. NG911 and other providers directly contracting with PSAPs can similarly address these responsibilities as part of their underlying contractual and operational arrangements. In some cases, outage incidents will continue to result in a PSAP receiving multiple notifications for the same event. But this outcome is appropriate; different service providers maintain their own alarms and monitoring systems and visibility into their own

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<sup>4</sup> See *Public Notice* at 3.

<sup>5</sup> See 47 C.F.R. § 4.9(h).

networks, so when a PSAP directly contracts with multiple 911 service providers, it makes sense that the entity with the most visibility into the outage be responsible to notify the PSAP.

Covered 911 service providers and other service providers can take steps, however, to minimize these incidents or ensure that multiple reports do not unnecessary confuse the affected PSAP(s). Multiple covered 911 service providers could contractually arrange for a single entity to deliver the notification, in coordination with the PSAP. Originating service providers can periodically double-check their notification triggers to minimize the instances in which they are inadvertently notifying PSAPs of outages for which the PSAPs' covered 911 service providers are responsible. The ATIS NRSC's ongoing project to establish a standard format for 911 outage reporting—which Verizon helped develop and supports—could also help minimize PSAPs' confusion during incidents for which they receive multiple notifications. But PSAPs and their service providers cannot avoid the issue entirely; it is not always feasible to promptly identify the exact source and scope of every outage, and service providers will in some cases need to err on the side of caution to ensure both that PSAPs are aware of 911 delivery problems and that they meet their underlying Part 4 notification obligations.

Respectfully submitted,

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